

Message

From: R6EthyleneOxide [R6EthyleneOxide@epa.gov]
Sent: 8/19/2021 5:17:52 PM
To: Casso, Ruben [Casso.Ruben@epa.gov]
CC: Verhalen, Frances [verhalen.frances@epa.gov]
Subject: Fw: Indorama / Huntsman Ethylene Oxide upsets in National Response Center Data --upsetting trends

R6 has received an email regarding ethylene oxide. It pertains to you or your area of expertise. Please respond within 10 days and copy your response to the EtO mailbox (R6EthyleneOxide@epa.gov). If this email does not pertain to your area of expertise, please contact Fran Verhalen at 214-665-2172 or verhalen.frances@epa.gov.

Thank you.

From: Scott Eustis <scott@healthygulf.org>
Sent: Wednesday, August 18, 2021 11:31 AM
To: R6EthyleneOxide <R6EthyleneOxide@epa.gov>
Subject: Indorama / Huntsman Ethylene Oxide upsets in National Response Center Data --upsetting trends

Indorama / Huntsman Ethylene Oxide upsets in National Response Center Data
upsetting trends

Dear EPA,

According to EPA tonight 50% of Ethylene Oxide releases from Huntsman / Indorama for [recent years] were due to process upsets. This was upsetting to hear.

It seems that relying on EPA's information in 2020 is unwise, since Industry was exempt from reports beginning March 13, 2020. The 2020 report is from January, consistent with the rule that reports were no longer required. EPA mentioned that it didn't know about unreported leaks.

This is troubling, in regards to 2020. Using 2020 as a communications point for any plant, but especially Indorama, is misleading, and without context.

What is that context? I hope that this will assist EPA on how to present incidents, should upsets be a major factor in an analysis.

Thanks to Skytruth, we can rapidly search for Ethylene Oxide National Response Center incidents in the geography of Port Neches.

alerts.skytruth.org/issue/186-ethylene-oxide-search-port-neches

I have compiled records of these 'upsets' below. If the air pollution was over a certain threshold, Huntsman / Indorama was required to report that upset to National Response Center.

These are linked here and attached as a .csv

https://docs.google.com/spreadsheets/d/121I4oZtpzAe2fyvGPQakKI9p_HejarGpmsKwNyuTvUg/edit#gid=0

Each record contains a report, such as this one in 2015. I invite you to browse some of them.

CALLER STATED THAT THE FACILITY LOSS POWER DUE TO WEATHER CONDITIONS CAUSING A RELEASE TO THE FLARE. CALLER STATED THAT THE MATERIALS RELEASED WERE ETHYLENE, ETHYLENE OXIDE, AND BENZENE TO THE ATMOSPHERE.

There are rarely volumes of pollution recorded in these reports, but TCEQ may have other records from these incidents.

There is one upset in the National Response Center Data from 2020. That indeed is the lowest number of upsets on record. This was mentioned several times.

The overall trend is toward increasing upsets per year, and the trend defies this one, questionable year.

There were 125 total upsets since January 2001 (there are 6 reports with updated information, which is why this sheet has 131 records).

There was a peak in 2016, another high point in 2018, and Indorama has been operating since 2021, when there were 11 upsets.

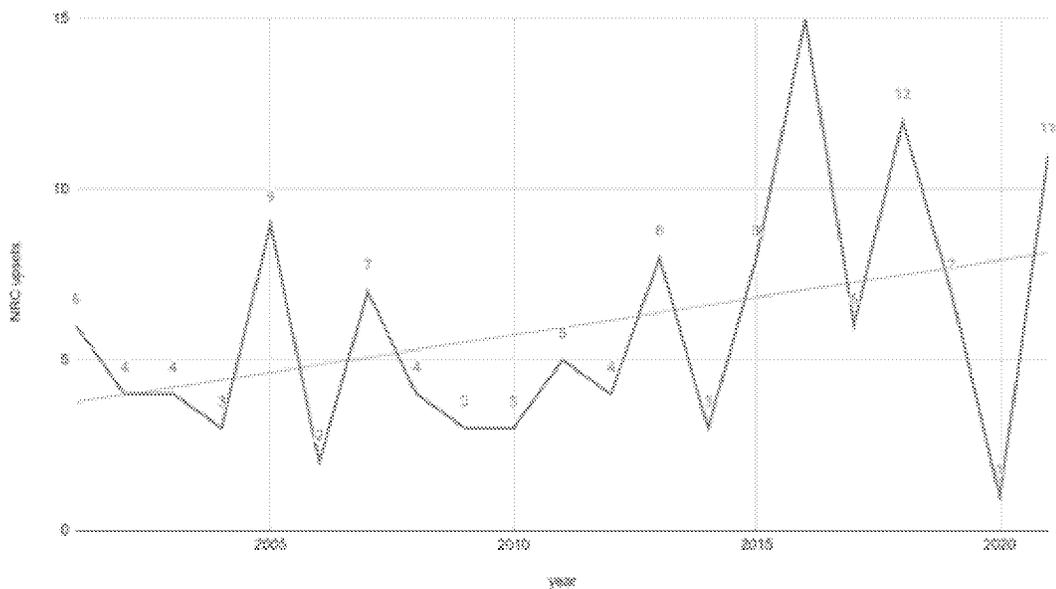
Indorama has a higher amount of upsets than in most years, well above the average, but within the average for recent years.

Storm upsets are also increasing, although the peak was Rita in 2005.

Upsets from Freezes are increasing in the reports.

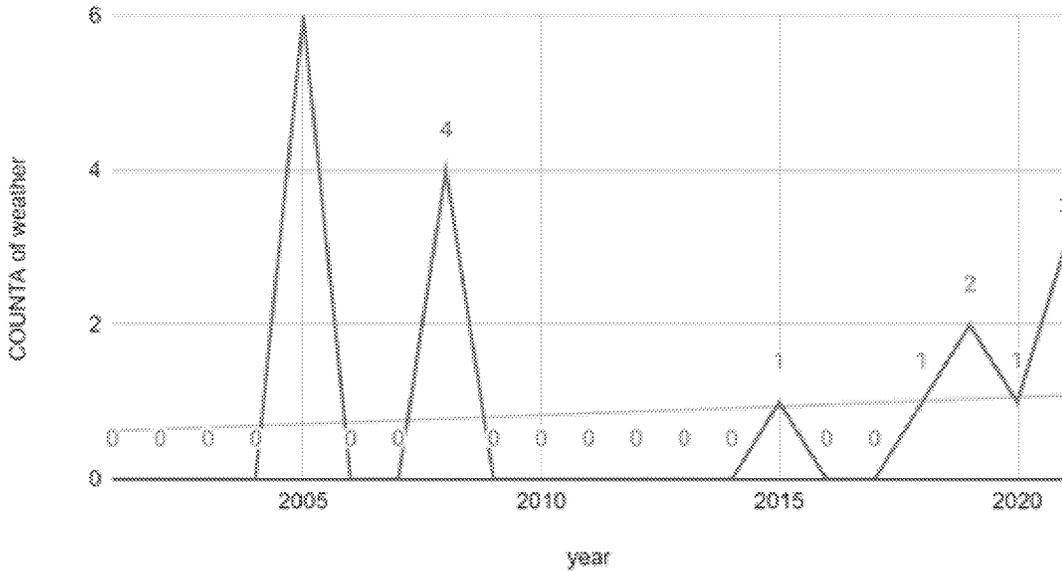
Upsets from Power losses peaked in 2018.

NRC upsets vs. year



Federal Disasters also appear in the reports, Rita, Ike, random storms, and freezes.

COUNTA of weather vs. year



Indorama's upsets record is not great, considering that they've been operating less than a year. This reflects the trend since 2016 of the facility having many upsets.

I have not reviewed the data for Equipment Failures over time, but may in the future if that is interesting, let me know.

I asked a question into the chat (attached) concerning whether the poor recent record prompted the sale or re-organization of the facility, since Dow selling its Reserve facility to Denka was prompted by the company's concern for health liabilities associated with pollution.

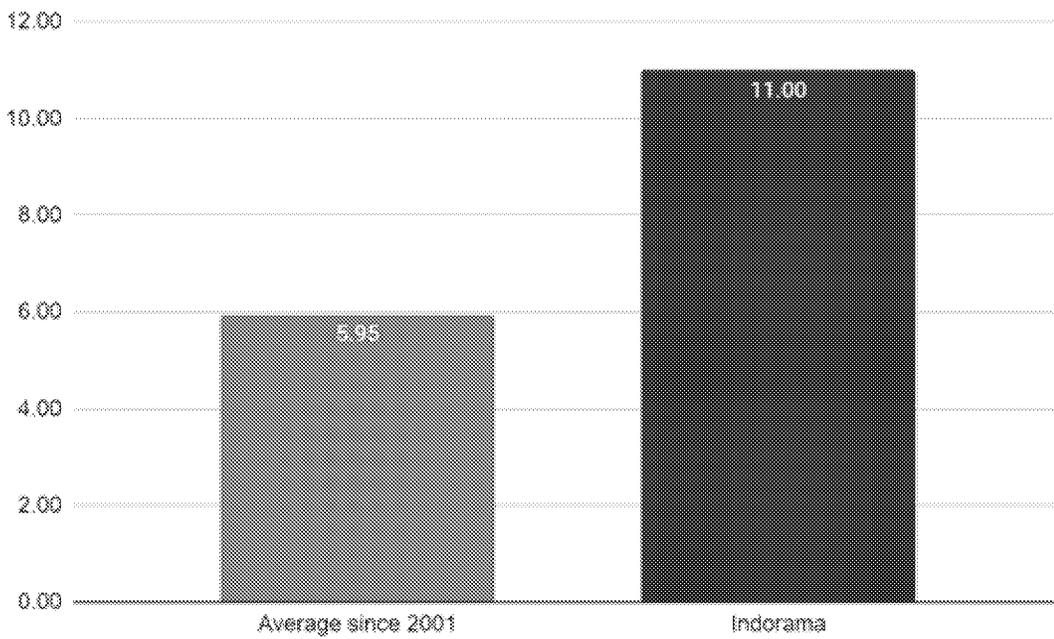
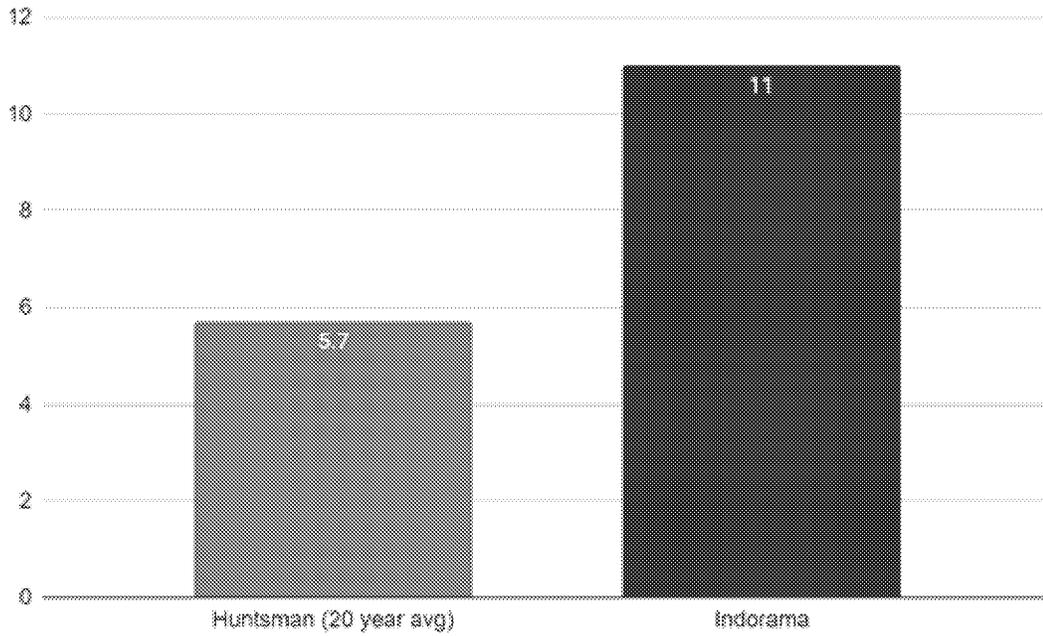
This facility really needs a major re-organization. If the facility is hiring, new hires should reflect the local population, and should benefit the local population.

What jobs does Indorama have by race?

The facility did claim many local hires, but we heard a question from Hilton Kelley about the need for an **explicit breakdown of hires by demographic**. Block Groups closest to the facility, like Nederland and Groves, are over 90% white. Some Block Groups in Port Arthur are over 90% Black, and others, majority Latino, are over 90% NonWhite.

The American Community Survey data from 2018 are here

<http://www.justicemap.org/jtiny=17445>



I hope this information serves as some basis for discussing the ongoing issues with this facility, one of the largest Ethylene Oxide emitters in the United States.

For a healthy Gulf,

--

Scott Eustis

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Schedule a meeting with me:

<https://calendly.com/scott-healthygulf>